

**- EXHIBIT A -**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

Index No.:

D/Purch.:

-----X SUMMONS

BENJAMIN ROMAN,

Plaintiff,

Plaintiff designates

**KINGS** County

As the Place of Trial.

-against-

STOP AND SHOP SUPERMARKET CO., LLC.,

The basis of venue:

Plaintiff residence

Defendants.

Plaintiff resides at:

130 3<sup>rd</sup> Avenue

-----X Brooklyn, NY 11217

**To the above named Defendants:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: BROOKLYN, NEW YORK  
March 4, 2021

*Emil J. Sanchez*

EMIL SANCHEZ, ESQ.

FRIEDMAN & SANCHEZ, LLP

Attorneys for Plaintiff

BENJAMIN ROMAN

16 Court Street, 26<sup>th</sup> Floor

Brooklyn, New York 11241

(718) 797-2488

TO: STOP & SHOP SUPERMARKET CO., LLC  
625 Atlantic Avenue  
Brooklyn, NY 11217

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
BENJAMIN ROMAN,

Plaintiff,

Index No.:

-against-

**VERIFIED COMPLAINT**

STOP AND SHOP SUPERMARKET CO., LLC.,

Defendants.

-----X

Plaintiff, BENJAMIN ROMAN, by his attorneys, FRIEDMAN SANCHEZ, LLP, complaining of the Defendants, respectfully alleges, upon information and belief, as follows:

1. At all times herein mentioned, Plaintiff, BENJAMIN ROMAN, was, and still is, a resident of Kings County, City and State of New York.

2. That at all times herein mentioned, defendant, STOP AND SHOP SUPERMARKET CO., LLC, was, and still is, a domestic business corporation, duly organized, existing and doing business in the State of New York.

3. That on February 2, 2019, and all times herein mentioned, a premises existed in the City of New York, with the address of 625 Atlantic Avenue, Brooklyn, NY 11217.

4. That at all times herein mentioned, defendant, STOP AND SHOP, owned the premises located at 625 Atlantic Avenue, Brooklyn, NY 11217.

5. That at all times herein mentioned, defendant, STOP AND SHOP, operated the premises located at 625 Atlantic Avenue, Brooklyn, NY 11217.

6. That at all times herein mentioned, defendant, STOP AND SHOP, managed the premises located at 625 Atlantic Avenue, Brooklyn, NY 11217.

7. That at all times herein mentioned, defendant, STOP AND SHOP, maintained the

premises located at 625 Atlantic Avenue, Brooklyn, NY 11217.

8. That at all times herein mentioned, defendant, STOP AND SHOP, controlled the premises located at 625 Atlantic Avenue, Brooklyn, NY 11217.

9. That in the County of Kings, City and State of New York, at all times hereinafter mentioned, the defendant, STOP AND SHOP, owned the premises and appurtenances and fixtures thereto, located at 625 Atlantic Avenue, Brooklyn, NY 11217.

10. Upon information and belief, the defendant, STOP AND SHOP, used and employed store clerks, cashiers, staff members and others who were employed, authorized, and retained and permitted by the defendant grocery store to render services and perform all necessary and proper functions pertaining to the service and assistance for persons in the defendant grocery store.

11. That on February 2, 2019, it was the duty of defendants to own, operate, manage, maintain and control the aforesaid premises in a reasonably safe condition and supervise its agents, servants and employees.

12. That on February 2, 2019, plaintiff, BENJAMIN ROMAN, was lawfully at the aforesaid premises as defendant's customer.

13. That on or about February 2, 2019, while plaintiff, BENJAMIN ROMAN, was lawfully inside said premises, the defendants so negligently, carelessly and recklessly owned, operated, managed, maintained and controlled their premises, so as to cause the plaintiff to slip and fall due to a dangerous condition and thereby to sustain serious injuries.

14. The aforesaid occurrence and resulting injuries to plaintiff were occasioned solely through and by reason of the carelessness and negligence of the defendants in the ownership, operation, maintenance, management, repair and control of their premises, without any fault of negligence on the part of the plaintiff contributing thereto.

15. That by reason of the foregoing, this plaintiff was rendered sick, sore, lame, and disabled, and, upon information and belief, was permanently injured and so remains, was compelled to remain away from his usual duties and vocation, and was compelled to incur divers obligations, and in the future will be further compelled to incur divers obligations in an effort to heal and cure his injuries, all to his damage.

16. That the damages and injuries to the plaintiff were caused by reason of the carelessness and negligence of the defendants.

17. The amount of damages in this action exceeds the jurisdictional amount of all lower courts which would otherwise have jurisdiction.

18. WHEREFORE, plaintiff, BENJAMIN ROMAN, demands judgment against the defendant in an amount which exceeds the jurisdictional limits of all lower courts; all together with the costs and disbursements of this action.

Dated: Brooklyn, New York  
March 4, 2021

Yours, etc.,

  
EMIL SANCHEZ, ESQ.

FRIEDMAN SANCHEZ, LLP  
*Attorneys for Plaintiff*  
16 Court Street, 26<sup>th</sup> Floor  
Brooklyn, New York, 11241  
(718) 797-2488

**ATTORNEY'S VERIFICATION**

**EMIL J. SANCHEZ**, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under the penalties of perjury:

I am an attorney at FRIEDMAN SANCHEZ, LLP, attorneys of record for Plaintiff(s),

**BENJAMIN ROMAN**. I have read the annexed

**SUMMONS AND COMPLAINT**

and know the contents thereof, and the same are true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon facts, records, and other pertinent information contained in my files.

The reason this verification is made by me and not Plaintiff(s) is that Plaintiff(s) is/are not presently in the county wherein the attorneys for the plaintiff(s) maintain their offices.

DATED: Brooklyn, New York  
March 4, 2021

  
\_\_\_\_\_  
**EMIL J. SANCHEZ**